

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

KOL HADASH HUMANISTIC)	
CONGREGATION, and)	
DC CENTRAL KITCHEN,)	
)	
Plaintiffs,)	
v.)	Case No. 1:22-CV-6532
)	
PAYPAL INC.,)	
PAYPAL CHARITABLE GIVING FUND,)	
CARLTON LORENZ, and)	
NICK ALDRIDGE,)	
Defendants.)	

NOTICE OF REMOVAL

Defendants, PayPal, Inc. (“PayPal”), PayPal Charitable Giving Fund (“PPGF”), and Carlton Lorenz (“Lorenz”) (collectively, the “Removing Defendants”), hereby give notice of removal of the following action to the United States District Court for the Northern District of Illinois, pursuant to 28 U.S.C. §§ 1331:

Kol Hadash Humanistic Congregation, et al. v. PayPal, Inc., et al.
Case No. 2022CH10442
Cook County Circuit Court, Illinois

(herein the “State Court Action”).

Pursuant to 28 U.S.C. § 1446(a), the Removing Defendants state the following grounds for removal:

1. On or about October 21, 2022, Plaintiffs Kol Hadash Humanistic Congregation and DC Central Kitchen (“Plaintiffs”) commenced this action by filing a purported Class Action Complaint with the Cook County Circuit Court.
2. On October 22, 2022, Plaintiffs sent an email copy of the file-stamped Class Action Complaint to the undersigned counsel, requesting acceptance of service of process.

3. On October 24, 2022, Plaintiffs served PayPal and PPGF with the Class Action Complaint.

4. On October 31, 2022, Plaintiffs served Lorenz with the Class Action Complaint.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of the Class Action Complaint, the only document which has been served upon the Removing Defendants in the State Court Action, is attached hereto as **Exhibit 1**.

6. This notice is timely filed within thirty (30) days following the Removing Defendants' receipt of the initial pleading in accordance with 28 U.S.C. § 1446(b).

7. For purposes of federal question jurisdiction, "the district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States." 28 U.S.C. § 1331.

8. Plaintiffs assert a claim for a Violation of the Lanham Act, 15 U.S.C. § 1125(a). This claim arises under the laws of the United States. (Complaint ¶¶ 178–189). The Lanham Act confers original jurisdiction on all district and territorial courts of the United States for "all actions arising under" the Lanham Act, "without regard to the amount in controversy or to diversity or lack of diversity of the citizenship of the parties." 15 U.S.C. § 1121.

9. Because this action arises under the laws of the United States pursuant to 28 U.S.C. § 1331, this action may be removed to this Court, the "district and division embracing the place where such action is pending," pursuant to 28 U.S.C. § 1441(a).

10. A copy of this Notice of Removal is being served upon Plaintiffs, through their attorneys of record, and upon the Clerk of the Cook County Circuit Court. A true and correct copy of the corresponding Notice of Filing Notice of Removal to be filed in the State Court Action is attached hereto (without exhibits) as **Exhibit 2**.

11. The Removing Defendants each consent to the removal of the State Court Action.

12. Upon information and belief, Nick Aldridge has not been served with process at the time of filing the removal, and therefore, his joinder or consent to the removal is unnecessary. 28 U.S.C. § 1446(b)(2)(A).

WHEREFORE, the Removing Defendants request that the referenced State Court Action be removed to this Court pursuant to 28 U.S.C. § 1331.

Date: November 21, 2022

Respectfully submitted,

HUSCH BLACKWELL LLP

By: *s/Francis H. LoCoco*

Francis H. LoCoco

Francis H. LoCoco
frank.lococo@huschblackwell.com
Margaret K. Heitkamp (ARDC No. 6322576)
Margaret.Heitkamp@huschblackwell.com
511 North Broadway
Suite 1100
Milwaukee, WI 53202
Tel: 414.273.2100
Fax: 414.223.5000
Attorneys for Defendants
PayPal, Inc., PayPal Charitable Giving Fund, and
Carlton Lorenz

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2022, the foregoing document was filed via this Court's electronic filing system and that copies of same were served upon all parties via certified mail to counsel of record.

s/Francis H. LoCoco
Francis H. LoCoco